

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

JUAN CARLOS LEON-HERRERA,

Plaintiff,

v.

Case No. 2:24-cv-00153-MIS/GJF

JORGE ZUNIGA ISAIS d/b/a RVJ
TRANSPORT; CUSTOM PRO
LOGISTICS, LLC; THEY SYGMA
NETWORK, INC.; AND CAL FRESCO,
LLC.

Defendant.

NOTICE OF COMPLETION OF BRIEFING

Defendant, Custom Pro Logistics, LLC (“Defendant”) by and through its counsel of record, Mayer LLP (Brian J. Fisher and J. Ashley Cummings), hereby files this Notice of Completion of Briefing pursuant to D.N.M.LR-Civ. 7.4 and notifies the Court of the following:

1. *Defendant Custom Pro Logistics, LLC’s Motion to Dismiss Pursuant to Federal Rule of Civil Procedure 12(b)(6) [Doc. 41] was filed and served on October 25, 2024;*
2. *Plaintiff’s Response to Defendant Custom Pro Logistics, LLC’s Motion to Dismiss [Doc. 53] was filed and served on December 3, 2024. See Doc. 53.*
3. *Defendant Custom Pro Logistics, LLC’s Reply In Support Of Motion To Dismiss [Doc. 64] was filed and served on December 31, 2024.*

By submitting this Notice of Completion of Briefing, Defendant represents that *Defendant Custom Pro Logistics, LLC's Motion to Dismiss Pursuant to Federal Rule of Civil Procedure 12(b)(6)* [Doc. 41] is ready for decision.

Respectfully submitted,

MAYER LLP

By: /s/ Brian J. Fisher
Brian J. Fisher
J. Ashley Cummings

4101 Indian School Road NE
Suite 301N
Albuquerque, New Mexico 87110
Telephone: 505.483.1840
Facsimile: 505.483.1841
Email: BFisher@mayerllp.com
ACummings@mayerllp.com

Attorneys for Custom Pro Logistics, LLC

CERTIFICATE OF SERVICE

This is to certify that on December 31, 2024, a true and correct copy of the foregoing was forwarded to the following counsel of record via CM/ECF and electronic mail pursuant to Federal Rule of Civil Procedure 5:

Jason F. DeSouza jason@jfdlawfirm.com

Jorge L. Alvarez jorge@jfdlawfirm.com

DESOUSA INJURY LAWYERS

4047 Naco Perrin

San Antonio, Texas 78217

Attorneys for Plaintiff

Raúl P. Sedillo rsedillo@jshfirm.com

Sky Willard swillard@jshfirm.com

JONES, SKELTON & HOCHULI P.L.C.

8220 San Pedro Drive NE, Suite 420

Albuquerque, New Mexico 87113

Attorneys for Defendant, Jorge Zuniga Isais

d/b/a RVJ Transport

Judd C. West jcwest@hollandhart.com

Julia Broggi jbroggi@hollandhart.com

HOLLAND & HART LLP

110 N. Guadalupe, Suite 1

Santa Fe, New Mexico 87501

Attorneys for Defendant, The Sygma

Network, Inc.

By: /s/ Brian J. Fisher
Brian J. Fisher